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*Attorneys for Defendant State of
 Nevada, Department of Health and
 Human Services, Division of Child
 and Family Services*

**IN THE UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

GODFREY MERE, an individual,

 Plaintiff,
 vs.

STATE OF NEVADA, DEPARTMENT OF
 HEALTH AND HUMAN SERVICES,
 DIVISION OF CHILD AND FAMILY
 SERVICES, Desert Willow Treatment Center;
 DOES 1-10 and ROES I-X, inclusive;

 Defendants.

Case No. 2:23-cv-00487-JCM-DJA

**STIPULATION AND ORDER TO
 EXTEND DISCOVERY AND
 DISPOSITIVE MOTION DEADLINES**

(First Request)

Plaintiff, GODFREY MERE, and Defendant STATE OF NEVADA, DEPARTMENT OF
 HEALTH AND HUMAN SERVICES, DIVISION OF CHILD AND FAMILY SERVICES, DESERT
 WILLOW TREATMENT CENTER, by and through their respective counsel, hereby stipulate to
 and respectfully request that the Court extend the following deadlines set forth in the parties' Discovery
 Plan and Scheduling Order (ECF 20) by ninety (90) days:

Description	Original Deadline (ECF No. 20)	Proposed Deadline
Discovery Cut-off	April 8, 2024	July 7, 2024
Dispositive Motions	May 8, 2024	August 6, 2024

Pretrial Order and Disclosures	If no dispositive motions, June 7, 2024; otherwise, 30 days after decision on dispositive motions or further court order.	If no dispositive motions, September 5, 2024; otherwise, 30 days after decision on dispositive motions or further court order.
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1. This request is based on:

a. Since the scheduling order was entered on June 26, 2023, the parties have engaged in dispositive motion practice, an early neutral evaluation session, some written discovery; and amendment of pleadings.

b. Plaintiff filed his second amended complaint (ECF 33) on February 6, 2024, and Defendant answered on February 23, 2024, (ECF 35) only 45 days prior to the end of discovery.

c. Previous defense counsel left the office of the attorney general shortly after the second amended complaint was filed, and the undersigned chief of the Personnel Division, who has had to assume responsibility for this case while recruiting for a replacement, needs much more time to engage in and complete discovery.

2. This is the first request for an extension of these deadlines and is not made for purposes of undue delay.

APPROVED AS TO FORM AND CONTENT on the 18th day of March, 2024.

AARON D. FORD
ATTORNEY GENERAL

By: /s/ Cameron Vandenberg
CAMERON P. VANDENBERG
Chief Deputy Attorney General
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Attorneys for Defendant

GUINNESS LAW FIRM

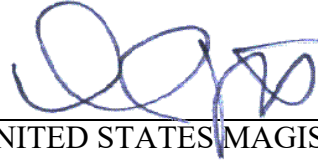
BY: /s/ Guinness Ohazuruike
GUINNESS OHAZURUIKE, ESQ.

Attorney for Plaintiff

ORDER

IT IS SO ORDERED that the parties' stipulation to extend discovery and dispositive motions deadline (ECF No. 36) is GRANTED.

DATED: 3/19/2024



UNITED STATES MAGISTRATE JUDGE